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January 17, 2023

Via ECF

The Hon. Michael B. Kaplan, Chief Judge
Clarkson Fischer Building & United States Courthouse
Courtroom #8
402 East State Street
Trenton, NJ 08608

Re: In re LTL Management, LLC
Adv. Proc. No. 22-01393

Dear Judge Kaplan:

We have recently been retained as counsel for Dr. Jacqueline Moline in the In Re LTL Management, LLC, Adversary Proceeding No. 22-01393 matter. Unfortunately, we are compelled to withdraw as counsel due to an unforeseen conflict. Dr. Moline has two immediate deadlines. **First**, the deadline to Answer, Move or Otherwise Respond to the Complaint—which is due to be filed tomorrow. In light of the unforeseen conflict, Debtor has agreed to a 30 day extension of time for Dr. Moline to respond.

The **second deadline** is Dr. Moline's response to Debtor's request for expedited discovery of Dr. Moline's data. Dr. Moline is currently required to file a response on Monday



(less than one week from today), January 23, 2023. Debtor refuses to consent to a 30 day extension of time. We respectfully renew our request that Dr. Moline be granted 30 days to respond to this discovery demand as well. A 30 day extension may be necessary for her new counsel to have adequate time to prepare a response. Although Debtor claims there is great urgency to obtaining this data, there has been no demonstration of immediacy, rather this is a normal and routine discovery request. Third, 30 days is warranted in light of the interests of non-parties who may be affected by rushed discovery.

We respectfully request the Court's guidance as this matter is otherwise on for a hearing before Your Honor tomorrow.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'J. Pollock', written over a light blue horizontal line.

JEFFREY M. POLLOCK

cc: Counsel of Record (Via ECF and electronic mail)